

Exhibit 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JAMAAL CAMERON; RICHARD BRIGGS;
RAJ LEE; MICHAEL CAMERON; MATTHEW
SAUNDERS, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

MICHAEL BOUCHARD, in his official capacity
as Sheriff of Oakland County; CURTIS D.
CHILDS, in his official capacity as Commander of
Corrective Services; OAKLAND COUNTY,
MICHIGAN,

Defendants.

Case No. 20-cv-10949

DECLARATION OF ANTONIO FENN

I, Antonio Fenn, declare:

I make this declaration based upon my own personal knowledge, and if called to testify, I could and would do so competently.

1. I am currently detained in the Oakland County Jail and have been detained here since October 30.
2. When I arrived at the Jail, I was placed into quarantine along with other new arrivals in cell F. During my time in quarantine, two different guys were pulled out of my unit on suspicion of being positive for COVID-19. However, I was not promptly tested for the coronavirus despite being exposed to these individuals.

3. After 13 or 14 days in quarantine, I was finally tested, and was moved to my current cell, cell number A1C. It is a ten-man cell with 8 other guys in it. It's incredibly crowded and we are packed in here with almost no room to move. Social distancing is completely impossible. Two guys are even sleeping on the floor in the space between the two rows of bunks where the rest of us are head to toe.
4. They recently stopped serving us commissary. Me and the guys in my cell asked an old white lady who works in food service for Aramark, the company that provides food in the jail, about the commissary closing. She told us that some Aramark employees had tested positive for COVID-19 and this was why commissary was closed.
5. This is not the only source of information we've received about an outbreak of COVID-19 in the jail. One of the deputies, a younger guy, told us that 18 deputies were sent home and tested and that 11 of them tested positive. He told us other deputies are calling in sick because they are scared to be in the jail right now. The same deputy told us that inmates are "catching the virus back-to-back."
6. There is also a trustee I talk to a lot because he is my good friend, and he brings me word about COVID-19 cases. Because he's a trustee and moves around the jail a lot, he has better information than I do. He both told us about the Aramark employees testing positive, and that a dentist who works in the Jail brought the virus in. He said a couple of trustees have tested positive too as a result.
7. There was a guy named Daniel in the cell next to mine. He is my bunkmate Henry's father. Daniel has lymphoma. A couple of days ago, he was pulled out of his cell and moved after showing symptoms of COVID-19. He sent word back to Henry through a trustee that he'd tested positive for COVID-19. However, after Daniel was removed from his cell neither the guys in my cell nor the guys in Daniel's cell were tested for COVID-19, even though we were all exposed to Daniel.

Honestly, this place is hell. I can see why Oakland is the richest county in the state, it's because they don't spend any money keeping us safe or making this place livable for a human being. All we get to eat is peanut butter and bologna sandwiches and little army-style pre-cooked bags of pizza that taste 8-months old. I am scared for my life in this jail. I have asthma and am at risk if I catch

COVID-19, and they have no idea how to stop the virus in here. All they give us is flimsy paper masks, and they don't give us new ones when they wear out. I've been here three weeks without getting a new mask. The first one I got was ruined when it got wet one day and I had to beg another inmate to give me a spare. I've been asking the guards for six days to bring me a new mask and no one will.

8. Two days ago, I developed a really sore throat, my asthma has started acting up, and I am experiencing a splitting headache. I fear that I have the virus and am just praying that I will be ok.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

November 19, 2020

/s/Antonio Fenn
Antonio Fenn

*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above declaration. I am an attorney admitted to the Eastern District of Michigan. On November 19, 2020, I personally spoke with Antonio Fenn and read this declaration to him. Mr. Fenn told me that the information in the above declaration is true, and gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/Philip Mayor
Philip Mayor